

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

Hyunhuy Nam,

Plaintiff,

- against -

Permanent Mission of the Republic of Korea to the  
United Nations,

Defendant.

Case No. 1:21-cv-06165

**NOTICE OF MOTION**

**PLEASE TAKE NOTICE** that Plaintiff Hyunhuy Nam, by and through their attorneys, Hang & Associates, PLLC, will move this Court at the United States Courthouse for the Southern District of New York, located at 40 Foley Square, New York, New York, 10007, before the Honorable RONNIE ABRAMS, at a time and date to be designated by the Court, for an order, pursuant to Rule 56 of the Federal Rules of Civil Procedure, granting Partial Summary Judgment in favor of Plaintiff Hyunhuy Nam against Defendant Permanent Mission of the Republic of Korea to the United Nations and for such other and further relief as the Court deems just, proper, and equitable.

**PLEASE TAKE FURTHER NOTICE** that Plaintiff will rely on the concurrently-filed Memorandum in Support of Motion, Declaration of Yongjin Bae in Support of the Motion, the Rule 56.1 Statement of Undisputed Material Facts, the Proposed Order, the pleadings and papers on file in this action, and on such other and further evidence as may be presented prior to, and at, the hearing on this motion.

**PLEASE TAKE FURTHER NOTICE** that opposition papers, if any, shall be filed in accordance with the Court's scheduling order or individual practices, to be entered upon and/or after the filing of the within motion papers.

Dated: Flushing, New York  
July 28, 2022

HANG & ASSOCIATES, PLLC.

/s/ *Yongjin Bae*

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